

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO, et al., §  
*Plaintiffs*, §  
§  
v. § Case No. 5:21-cv-844-XR  
§  
GREGORY W. ABBOTT, et al., §  
*Defendants*. §  
§

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**STATE DEFENDANTS NOTICE REGARDING THE COURT'S ORDER FOR IN  
CAMERA INSPECTION (ECF 652)**

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Out of approximately 22,000 produced in this case, State Defendants withheld 927 and has produced privilege logs for those documents. The procedural background of those productions and privilege logs are described in State Defendants' Response to LUPE Plaintiffs' Motion to Compel (ECF 650 at 3–5). On June 21, 2023, LUPE Plaintiffs filed a motion to compel challenging the privilege assertions of 240<sup>1</sup> of those documents as reflected in Exhibits G–K to LUPE Plaintiff's Opposed Motion to Compel. (ECF 630-8–ECF 630-12). The Court has ordered State Defendants to produce the documents for *in camera* inspection. (ECF 652). The purpose of this notice is to provide the Court with the information necessary to facilitate the review of the documents.

Subsequent to LUPE Plaintiffs filing their Motion to Compel, State Defendants re-reviewed the privilege assertions for the 240 challenged documents and made a supplemental production on June 30, 2023. Out of the 240 total challenged documents, 22 were produced in full should no longer

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<sup>1</sup> In some cases, State Defendants asserted and LUPE Plaintiffs challenged more than one privilege applicable to a single document. So while there may be more than 240 entries on LUPE Plaintiffs' challenge lists, there are only 240 unique documents at issue in the Motion to Compel.

be in dispute; 72 were produced in redacted form intended to preserve the privilege; 146 were withheld in their entirety.

In the production for *in camera* review, the Court should receive three folders: (1) a folder labelled “PRODUCED IN FULL” containing the 22 documents that have been produced in full unredacted form and are no longer in contest; (2) a folder labelled “PRODUCED WITH REDACTIONS” which contains the 76 documents that have been produced in redacted form and the complete unredacted version of those documents; and (3) a folder labelled “WITHHELD” which contains the 146 documents that have been withheld. In each of these folders, is a log identifying the source of LUPE Plaintiffs’ privilege challenge, the ID Number which will also be the file name of the file submitted to the Court, as well as the additional information identifying the document and privileges asserted. These logs will be produced separately to the parties.

Date: July 7, 2023

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on July 7, 2023, and that all counsel of record were served by CM/ECF.

*/s/ William D. Wassdorf*  
WILLIAM D. WASSDORF